

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
GOWANUS INDUSTRIAL PARK, INC.,

Plaintiff,

vs.

HESS CORP.,

Defendant.

Civil Action No. 10-05522
(JG) (JO)

ECF CASE

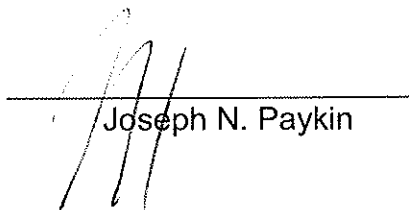
Declaration of Joseph N.
Paykin in Opposition to
Defendant's Motion to
Dismiss

Joseph N. Paykin, an attorney in good standing admitted to practice in New York State, including the United States District Courts for the Eastern District of New York, hereby declares under penalty of perjury as follows:

1. I am a member of Hinman, Howard & Kattell, LLP, attorneys for plaintiff Gowanus Industrial Park, Inc. and submit this declaration to place certain public record documents, of which the Court may take judicial notice, to provide useful background information relating to the pending motion to dismiss.

2. Annexed hereto as Exhibit 1 is a true and correct copy of the Quarterly Statement of Account through February 18, 2011, from New York City Department of Finance for the property known as 685 Columbia Street, Brooklyn, New York.

Declared under penalty of perjury on March 11, 2011.



Joseph N. Paykin

EXHIBIT 1



Quarterly Statement of Account

Owner Name: GOWANUS INDUSTRIAL PARK INC.
Property Address: 685 COLUMBIA ST.
Borough, Block & Lot: BROOKLYN (3), 00614, 0001

Mailing Address:
GOWANUS INDUSTRIAL PARK INC.
699 COLUMBIA ST.
BROOKLYN, NY 11231-1915

Statement Billing Summary

(Reflects Account Activity From Your Last Statement Through February 18, 2011)

Previous Balance	\$298,216.60
Amount Paid	\$-298,216.60
Interest	\$0.00
Unpaid Balance, If Any	\$0.00
Current Amount Due	\$0.00
Total Amount Due By April 1, 2011	\$0.00
Total Property Tax Amount Due April 1, 2011 From:	
First Central Savings Bank	\$0.00
You, The Property Owner	\$0.00

001400.01
13928



THIS STATEMENT IS FOR YOUR INFORMATION ONLY
IF YOU ARE HAVING PROBLEMS PAYING YOUR MORTGAGE,
PLEASE CALL 311 FOR HELP

Pay Today The Easy Way
nyc.gov/payonline
Fast.Easy.Accurate.Timely.

If You Pay Via On-Line Banking You Must Include This Account Number: 3-00614-0001

Total Amount Due By April 1, 2011 If You Still Have A Mortgage

\$0.00

#BWNFFBV
#8123262110218014#

GOWANUS INDUSTRIAL PARK INC.
699 COLUMBIA ST.
BROOKLYN NY 11231-1915



Amount Enclosed:

If Paying The Easy Way Isn't For You,
Mail Payment To:
NYC Department of Finance
PO Box 32
New York, NY 10008-0032



10



Statement Details

February 18, 2011
Gowanus Industrial Park Inc.
685 Columbia St.
Page 2

Previous Balance	Activity Date	Date	Amount
Finance-Property Tax		01/01/2011	\$298,216.60
Payment	12/28/2010	First Central Savings Bank	\$-298,216.60
Unpaid Balance, If Any			\$0.00

Annual Property Tax Detail

Tax Class 4 - Commercial Property	Tax Rate			
Current Tax Rate	10.3120%			
Estimated Market Value	\$21,505,900	Billable Assessed Value		
			Tax Rate	Taxes
Tax Before Exemptions And Abatements		\$5,848,531	X 10.3120%	= \$603,101
Tax Before Abatements		\$5,848,531		\$603,101
Annual Property Tax				\$603,101

Pay Today The Easy Way
nyc.gov/payonline
Fast.Easy.Accurate.Timely.

Your Prompt Payment Is Greatly Appreciated.

Did Your Mailing Address Change?

If So, Please Visit Us At nyc.gov/changemailingaddress Or Call 311.



Joseph N. Paykin
HINMAN, HOWARD & KATTELL, LLP
185 Madison Avenue, 7th Floor
New York, New York 10016
(212) 725-4423

*Attorneys for Plaintiff
Gowanus Industrial Park, Inc.*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
GOWANUS INDUSTRIAL PARK, INC.,

Plaintiff,

vs.

HESS CORP.,

Defendant.

Civil Action No. 10-05522
(JG) (JO)

ECF CASE

Certificate of Service

Document Electronically
Filed

I, Joseph N. Paykin, hereby certify as follows:

1. I am an attorney with the firm Hinman, Howard & Kattell, LLP, attorneys for plaintiff Gowanus Industrial Park, Inc. in the above-captioned matter.
2. I hereby certify that upon this date I served a true and correct copy of the memorandum of law and declaration of Joseph N. Paykin in opposition to defendant's motion to dismiss the complaint upon the following:

Charles S. Sims
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036
(212) 969-3000

Dated: New York, New York
March 11, 2011



Joseph N. Paykin